IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.,

Plaintiffs.

v.

WDC HOLDINGS LLC dba NORTHSTAR COMMERCIAL PARTNERS; BRIAN WATSON; STERLING NCP FF, LLC; MANASSAS NCP FF, LLC; NSIPI ADMINISTRATIVE MANAGER; NOVA WPC LLC; WHITE PEAKS CAPITAL LLC; VILLANOVA TRUST; CASEY KIRSCHNER; ALLCORE DEVELOPMENT LLC; FINBRIT HOLDINGS LLC; CHESHIRE VENTURES LLC; CARLETON NELSON; JOHN DOES 1-20,

Defendants.

800 HOYT LLC,

Intervening Interpleader Plaintiff / Intervening Interpleader Counter-Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC; PLW CAPITAL I, LLC; BW HOLDINGS; LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA SERVICES, INC.,

Interpleader Defendants / Interpleader Counter-Plaintiffs.

CASE NO. 1:20-CV-484-RDA-TCB

JOINT MOTION FOR A STATUS CONFERENCE

Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (collectively, "Amazon") and Defendants Brian Watson, WDC Holdings LLC dba Northstar Commercial Partners, NSIPI Administrative Manager, Sterling NCP FF, LLC, Manassas NCP FF, LLC, Casey Kirschner, Carleton Nelson, and Cheshire Ventures LLC (collectively, the "Parties") jointly move the Court for a telephonic status conference on April 1, 2022 or at the Court's earliest convenience. This matter currently has an April 8, 2022 fact discovery deadline (Dkt. 556). The Parties are expeditiously conducting fact discovery and are in ongoing discussions about the potential need to adjust the existing case schedule in light of existing and potential discovery motions, the need to adjust deposition dates, and other developments that may materially affect the case schedule. The Parties believe that obtaining guidance on these issues from the Court as promptly as possible will assist with their resolution. Currently, the Court is slated to hear Amazon's Motion for Default Judgment against Defendants Finbrit Holdings LLC, AllCore Development LLC, NOVA WPC LLC, White Peaks Capital LLC, and Villanova Trust on April 1, 2022 (Dkt. 578). That motion is unopposed. The Parties respectfully suggest that the Motion for Default Judgment be considered on the papers and that at or in lieu of that hearing, the Court set a telephonic conference on April 1.

For these reasons, the Parties respectfully request that this Court grant their Joint Motion for a telephonic status conference on April 1, 2022 or as soon as is convenient for the Court.

Dated: March 31, 2022

/s/ Michael R. Dziuban

Veronica S. Moyé (*pro hac vice*) GIBSON, DUNN & CRUTCHER LLP 2001 Ross Avenue, Suite 2100

Dallas, TX 75201

Telephone: (214) 698-3100 Facsimile: (214) 571-2900 vmoye@gibsondunn.com Elizabeth P. Papez (pro hac vice) Patrick F. Stokes (pro hac vice) Claudia M. Barrett (pro hac vice) David W. Casazza (pro hac vice)

Respectfully submitted,

Michael R. Dziuban (Va. State Bar No. 89136)

GIBSON, DUNN & CRUTCHER LLP

1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306 Telephone: (202) 955-8500 Facsimile: (202) 467-0539 epapez@gibsondunn.com pstokes@gibsondunn.com cbarrett@gibsondunn.com dcasazza@gibsondunn.com mdziuban@gibsondunn.com

Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

Stanley L. Garnett
Justin L. Cohen
Amanda K. Houseal
Brownstein Hyatt Farber Schreck LLP
410 Seventeenth St., Suite 2200
Denver, CO 80202-4432
sgarnett@bhfs.com
jcohen@bhfs.com
ahouseal@bhfs.com

/s/ Jeffrey Hamlin
George R. Calhoun
Jeffrey Hamlin
James M. Trusty
Ifrah Law, PLLC
1717 Pennsylvania Ave, N.W. Suite 650
Washington, DC 20006
george@ifrahlaw.com
jhamlin@ifrahlaw.com
jtrusty@ifrahlaw.com

Counsel for Defendants Brian Watson, WDC Holdings, LLC, NSIPI Administrative Manager, Sterling NCP FF, LLC, Manassas NCP FF, LLC

/s/ Rachel Friedman

Alex Little
Rachel Friedman
Burr & Forman LLP
222 Second Ave. South, Suite 2000

Nashville, TN 37201 Alex.little@burr.com rfriedman@burr.com

Counsel for Carleton Nelson and Cheshire

/s/ Casev Kirschner

Casey Kirschner (via U.S. mail)

635 N. Alvarado Lane Plymouth, MN 55447

Casey.kirschner@gmail.com

Pro se

Ventures

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

Casey Kirschner 635 N. Alvarado Lane Plymouth, MN 55447 By email: casey.kirschner@gmail.com

s/ Michael R. Dziuban

Michael R. Dziuban GIBSON, DUNN & CRUTCHER LLP 1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306 Telephone: (202) 955-8500

Telephone: (202) 955-8500 Facsimile: (202) 467-0539 mdziuban@gibsondunn.com

Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.